

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

JOHN GONZALEZ AS AGENT FOR LUCIA M MARTINEZ

(b) County of Residence of First Listed Plaintiff Bexar County, TX
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Brian Trenz, TRENZ LAW FIRM, 394 West Mistletoe Ave, San Antonio, TX 78212 (210) 802-2020

DEFENDANTS

US Bank Trust National Association as Trustee of the Buncalow Series IV Trust

County of Residence of First Listed Defendant New Castle, DE
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Richard E. Anderson, Anderson Vela, LLP, 4920 Westport Dr., The Colony, TX 75056 (214) 276-1545

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input checked="" type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 28 U.S.C. Sections 1446 and 1332
 Brief description of cause:
 Plaintiff seeks to stop foreclosure. Defendant counterclaims for judicial foreclosure.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ None CHECK YES only if demanded in complaint: JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE 01/10/2022 SIGNATURE OF ATTORNEY OF RECORD /s/ Richard E. Anderson

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
San Antonio ☐ DIVISION

Supplement to JS 44 Civil Cover Sheet
Cases Removed from State District Court

This form must be filed with the Clerk's Office no later than the **first business day** following the filing of the Notice of Removal. Additional sheets may be used as necessary.

The attorney of record for the removing party **MUST** sign this form.

STATE COURT INFORMATION:

1. Please identify the court from which the case is being removed; the case number; and the complete style of the case.

John Gonzalez as agent for Lucia M. Martinez v. U.S. Bank Trust N.A., as Trustee of the Bungalow Series IV Trust; Cause No. 2021-CI-26330; in the 288th Judicial District Court of Bexar County, Texas.

2. Was jury demand made in State Court? ☐ Yes ☒ No

If yes, by which party and on what date?

Party Name

Date

STATE COURT INFORMATION:

1. List all plaintiffs, defendants, and intervenors still remaining in the case. Also, please list the attorney(s) of record for each party named and include the attorney's firm name, correct mailing address, telephone number, and fax number (including area codes).

For Plaintiff/Counter Defendant John Gonzalez as agent for Lucia M. Martinez - Brian J. Trenz, TRENZ LAW FIRM, 334 West Mistletoe Ave. San Antonio, TX. 78212 Tel:(210) 802-5020 trenzlawfirm@gmail.com

For Defendant /Counter-Plaintiff US Bank -- Richard Anderson, ANDERSON VELA, L.L.P., 4920 Westport Drive, The Colony, Texas 75056 214.276.1545 – Telephone, 214. 276.1546 – Facsimile, randerson@andersonvela.com

2. List all parties that have not been served at the time of the removal, and the reason(s) for non-service.

U.S. Bank has not been served. According to the state court docket, citation has not been requested as of the date of the filing of the removal.

3. List all parties that have been non-suited, dismissed, or terminated, and the reason(s) for their removal from the case.

None.

COUNTERCLAIMS, CROSS-CLAIMS, and/or THIRD-PARTY CLAIMS:

1. List separately each counterclaim, cross-claim, or third-party claim still remaining in the case and designate the nature of each such claim. For each counterclaim, cross-claim, or third-party claim, include all plaintiffs, defendants, and intervenors still remaining in the case. Also, please list the attorney(s) of record for each party named and include the attorney's firm name, correct mailing address, telephone number, and fax number (including area codes).

U.S. Bank counterclaimed against John Gonzalez as agent for Lucia M. Martinez under a judicial foreclosure cause of action. Counter-Defendant is represented by the same attorney as Plaintiff listed in State Court Information I. Counter-Plaintiff is represented by the same attorney as Defendant listed in State Court Information I.

VERIFICATION:

Richard E. Anderson

01/10/2022

Attorney for Removing Party

Date

U.S Bank

Party/Parties

(NOTE: Additional comment space is available on page 3)

ADDITIONAL COMMENTS (As necessary):

None.

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**JOHN GONZALEZ, as agent for
LUCIA M. MARTINEZ**

Plaintiff/Counter-Defendant,

vs.

**U. S. BANK TRUST N. A., AS
TRUSTEE OF THE BUNGALOW
SERIES IV TRUST,**

Defendant/Counter-Plaintiff.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. _____

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1446(a), U. S. BANK TRUST NATIONAL ASSOCIATION AS TRUSTEE OF THE BUNGALOW SERIES IV TRUST, (“Defendant”, “Counter-Plaintiff”, or “US Bank”) files this *Notice of Removal* of this action from the 288th Judicial District Court of Bexar County, Texas. Defendant submits this Notice in support of this removal. Removal is based on the ground that diversity jurisdiction exists over this action because there is complete diversity between Plaintiff/Counter-Defendant and the Defendant/Counter-Plaintiff and the amount in controversy exceeds \$75,000.00, pursuant to 28 U.S.C. § 1332. Defendants respectfully shows as follows:

INTRODUCTION

1. On or about December 30, 2021, Plaintiff filed Plaintiff’s Original Petition and Plaintiff’s Verified Application for Temporary Restraining Order in the 288th Judicial District Court of Bexar County, Texas in Cause No. 2021-CI-26330 and styled *John Gonzalez as agent for*

Lucia M. Martinez v. U.S. Bank Trust N.A., as Trustee of the Bungalow Series IV Trust (the “State Court Action). In accordance with 28 U.S.C. Section 1446(a), copies of all process, pleadings, and orders served in the State Court Action, including the Petition, are attached hereto within the contents of Exhibit “B”.

2. The allegations in the Petition relate to foreclosure proceedings on Plaintiff’s real property and improvements located at 302 Eland Drive, San Antonio, Texas 78213 (the “Property”).

3. In their Petition, Plaintiff seeks a declaratory judgment that US Bank’s lien is unenforceable as any claim to enforce the lien is barred by the applicable four-year statute of limitations. US Bank brought a judicial foreclosure counterclaim against Plaintiff.

4. Defendant received notice of the filing of the suit on or about December 28, 2021 when their attorneys were provided a copy of the Petition via email from Plaintiff’s counsel. Defendant has not been served with citation as of the date of filing this Notice of Removal. This Notice of Removal is timely because thirty (30) days have not expired since Defendant learned of the lawsuit or since the state court lawsuit was initially filed, making removal proper in accordance with 28 U.S.C. Section 1446(b).

BASIS FOR REMOVAL – DIVERSITY JURISDICTION

A. There is complete diversity among all parties.

5. There is diversity jurisdiction in this Court because there is complete diversity of citizenship between Plaintiff and Defendant, and more than \$75,000 is in controversy, exclusive of interest and costs. *See* 28 U.S.C. § 1332.

6. Plaintiff is an individual and citizens of the state of Texas (*See Petition* at ¶1.).

7. Defendant US Bank is a national bank and a trustee of the Bungalow Series IV Trust. The citizenship of the trustee controls the determination of the citizenship of the trust for purposes of diversity jurisdiction. US Bank is, and at all times relevant to this action was, a national bank incorporated in Delaware with its main office located in Wilmington, Delaware. A national bank is a citizen of the state where its main office, as designated in its articles of association, is located. *Wachovia Bank, N.A. v. Schmidt*, 546 U.S. 303, 307 (2006). Thus, Plaintiff is a citizen of Delaware, and no other state, for purposes of diversity jurisdiction.

B. The amount in controversy exceeds \$75,000.00.

8. The amount in controversy exceeds the sum or value of \$75,000.00. In the Fifth Circuit, when declaratory or injunctive relief is sought, the amount in controversy is measured by the value of the object of the litigation, and the value of that right is measured by the losses that will follow. *Webb v. Investacorp, Inc.* 89 F.3d 252, 256 (5th Cir. 1996). Stated differently, “the amount in controversy, in an action for declaratory and injunctive relief, is the value of the right to be protected or the extent of the injury to be prevented.” *Leininger v. Leininger*, 705 F.2d 727, 729 (5th Cir. 1983); *see also Lamarr v. Chase Home Finance, LLC*, 2008 WL 4057301 (N.D. Miss. 2008) (finding amount in controversy requirement was satisfied where plaintiff sought to set aside foreclosure sale and home appraised for \$83,000.00, plus unspecified amount of monetary damages); *Bank of America National Trust and Sav. Assoc. v. Reeves*, 1995 WL 96617, *1 (E.D. La. 1995) (court held that the amount in controversy was met in action seeking to enjoin foreclosure on property because the suit “puts at issue the entire value of the property on which they attempt to enjoin defendants from foreclosing.”).

9. Plaintiff seeks to prohibit a foreclosure sale on the Property (*See* Petition at ¶¶ 6 & 7 and Application for TRO at Prayer). As a result, Plaintiff has put an amount in controversy equal

to the value of the Property. The Bexar County Appraisal District's most recent valuation of the Property shows a total assessed value at \$193,290.00 *See* Exhibit "C-1". There can be no question that Plaintiff's Petition and Application for TRO places an amount in controversy that significantly exceeds \$75,000.00. For the reasons stated, above there can be no dispute that Plaintiff seeks relief in excess of the minimum amount in controversy.

VENUE

12. Venue for removal is proper in this district and division, the United States District Court for the Western District of Texas, San Antonio Division, under 28 U.S.C. Section 1441(a) because this district and division embrace the 288th Judicial District Court, Bexar County, Texas, the forum in which the removed action was pending.

NOTICE

13. Pursuant to 28 U.S.C. Section 1446(d), a copy of this Notice is being filed with the Clerk of Court for the 288th Judicial District Court, Bexar County, Texas.

14. The contents of Exhibit B constitute the entire file of Cause No. 21-CI-26330 in the 288th Judicial District Court, Bexar County, Texas.

CONCLUSION

For the reasons described above, Defendant respectfully requests that this Court take jurisdiction over this matter and proceed as if it had been originally filed herein.

Respectfully submitted,

ANDERSON ★ VELA, L.L.P.
4920 Westport Drive
The Colony, Texas 75056
214.276.1545 – Telephone
214. 276.1546 – Facsimile

ATTORNEYS FOR U. S. BANK TRUST NATIONAL
ASSOCIATION AS TRUSTEE OF THE
BUNGALOW SERIES IV TRUST

By: /s/ Richard E. Anderson.

RICHARD E. ANDERSON
Texas State Bar No. 01209010
randerson@andersonvela.com – e-mail

CERTIFICATE OF SERVICE

I certify that on this the 11th day of January 2022, a true copy of the above document has been either delivered in person or delivered in person by my agent or delivered by courier with receipted delivery or sent by certified mail, return receipt requested, or sent by telephonic document transfer or by electronic delivery before 5:00 p.m. the recipient's local time to the following pursuant to the Texas Rules of Civil Procedure for each party listed on the attached service list.

SERVICE LIST

Brian J. Trenz
TRENZ LAW FIRM
334 West Mistletoe Ave
San Antonio, TX. 78212
Tel:(210) 802-5020

By: /s/ Richard E. Anderson.

RICHARD E. ANDERSON
List of All Parties

John Gonzalez as agent for Lucia M. Martinez, Plaintiff and Counter-Defendant

US Bank Trust National Association as Trustee of the Bungalow Series IV Trust, Defendant and Counter-Plaintiff

Removed from the Following Court

Cause No. 2021-CI-26330
288th Judicial District Court, Bexar County, Texas
HONORABLE JUDGE CYNTHIA MARIE CHAPA
Paul Elizondo Tower
101 W. Nueva, 4th Floor
San Antonio, TX 78205
Phone: 210-335-2663

Email the clerk: clerk288@bexar.org

Current Status of Removed Case

Pending

Record of Jury Demand

As of the filing of this Notice, the parties have not demanded a jury or paid a jury fee.

List of Counsel of Record

For Plaintiff/Counter Defendants

Brian Trenz
Texas State Bar No. 24067911
trenzlawfirm@gmail.com
TRENZ LAW FIRM
394 West Mistletoe Avenue
San Anotonio, TX 78212
Telephone: (210) 802-5020

For Defendants US Bank
and SN Servicing Corporation:

Richard E. Anderson
Texas State Bar No. 01209010
randerson@andersonvela.com
Anderson * Vela, L.L.P.
4920 Westport Drive
The Colony, Texas 75056
Telephone: (214) 276-1545
Facsimile: (214) 276-1546

INDEX OF DOCUMENTS ATTACHED

- Exhibit A: Copy of the Docket Sheet for Cause No. 2021-CI-26330, 288th Judicial District Court, Bexar County, Texas.
- Exhibit B: Pleadings and Orders in Cause No. 2021-CI-26330, 288th Judicial District Court, Bexar County, Texas.
- B-1 Plaintiff's Original Petition
 - B-2 Plaintiff's Verified Application for Temporary Restraining Order
 - B-3 Order Granting Temporary Restraining Order (2021.12.30)
 - B-4 Executed Process (NONE)
 - B-5 Defendant's Original Answer and Counterclaims
- Exhibit C: Declaration of Richard E. Anderson
- C-1 2021 Property Appraisal for 302 Eland Drive, San Antonio, TX 78213